

# The Dakota Bankruptcy Firm

# INVOICE

1630 1st Avenue N  
Suite B PMB 24  
Fargo, North Dakota 58102

Invoice # 10981  
Date: 01/18/2025

Jamieson CAPEX Fund, LLC

## 00470-Jamieson CAPEX Fund, LLC

### Case Administration

Attorney	Type	Date	Quantity	Rate	Discount	Total
Christianna Cathcart	Service	10/03/2024	3.30	\$200.00	100.0%	\$0.00
Work on drafting SOFA						
Christianna Cathcart	Service	10/07/2024	1.10	\$200.00	-	\$220.00
Work on SOFA, including research of judgments						
Christianna Cathcart	Service	10/08/2024	0.80	\$200.00	-	\$160.00
Email to Client and Review additional documentations needed						
Christianna Cathcart	Service	10/11/2024	2.10	\$200.00	80.0%	\$84.00
Forwarded the required documents to the U.S. Trustee and updated the SOFA. Email/Call to client						
Maurice VerStandig	Expense	10/17/2024	1.00	\$59.40	-	\$59.40
Mailing: Service of status conference order via third party mailing vendor						
Maurice VerStandig	Service	10/17/2024	0.10	\$400.00	-	\$40.00
Draft and file certificate of service for mailing of status conference notice						
Maurice VerStandig	Service	10/17/2024	0.20	\$400.00	-	\$80.00
Call with J. Carlson to prepare for initial debtor interview						
Maurice VerStandig	Service	10/17/2024	0.60	\$400.00	-	\$240.00
Attend initial debtor interview						
Maurice VerStandig	Service	10/17/2024	0.10	\$400.00	-	\$40.00
Call with Subchapter V trustee following IDI						
Maurice VerStandig	Service	11/07/2024	0.70	\$400.00	-	\$280.00
Attend continued meeting of creditors						
Maurice VerStandig	Service	11/08/2024	0.10	\$400.00	-	\$40.00

E-mail to S. Wencil re statement by client rep re income, made during meeting of creditors

Maurice VerStandig	Service	11/08/2024	0.20	\$400.00	-	\$80.00
Call with S. Wencil re US Trustee's reply to status report						
Maurice VerStandig	Service	11/08/2024	0.30	\$400.00	-	\$120.00
Review US Trustee reply to status report						
Maurice VerStandig	Service	11/09/2024	2.60	\$400.00	50.0%	\$520.00
Review exhibits to UST reply brief (0.8); Begin assessing outline of surreply and researching relevant citations (.5); Commence drafting surreply (1.3)						
Maurice VerStandig	Service	11/09/2024	0.20	\$400.00	-	\$80.00
Calls with J. Fasano (discussion ensued) and D. Evans (voicemail left) re potentially serving as CRO; Review follow up text message from D. Evans; Assess other potential candidates if CRO is needed						
Maurice VerStandig	Service	11/10/2024	0.10	\$400.00	-	\$40.00
Calls with client re US Trustee's reply to status report						
Maurice VerStandig	Service	11/10/2024	2.00	\$400.00	-	\$800.00
Continue drafting surreply to UST reply to status report (1.8); Review, revise and proofread same (.2); Draft amended disclosure (n/c); PDF and file surreply and amended disclosure (n/c)						
Maurice VerStandig	Service	11/10/2024	0.10	\$400.00	-	\$40.00
E-mail to S. Diaz re potentially serving as CRO						
Maurice VerStandig	Service	11/11/2024	0.40	\$400.00	-	\$160.00
Review state court litigation records						
Maurice VerStandig	Service	11/11/2024	0.30	\$400.00	-	\$120.00
Call with D. Evans re potentially serving as CRO in case						
Maurice VerStandig	Service	11/19/2024	0.50	\$400.00	-	\$200.00
Attend status conference via telephone						
Maurice VerStandig	Service	11/19/2024	0.10	\$400.00	-	\$40.00
Draft and file motion to pay retainer to Subchapter V trustee						
Maurice VerStandig	Service	11/22/2024	0.20	\$400.00	-	\$80.00
Call with J. Carlson re potential benefits of his resignation and candidates to step in as either new chief executive or CRO						
Maurice VerStandig	Service	11/22/2024	0.30	\$400.00	-	\$120.00
Review UST motion to convert or dismiss						
Christianna Cathcart	Service	11/22/2024	4.50	\$200.00	80.0%	\$180.00

Conflicts of interest research, email to US Trustee/client, Review client's file for documents requested by trustee.

Maurice VerStandig	Service	11/26/2024	0.30	\$400.00	-	\$120.00
Call with J. Kleisinger and A. Webb re serving as conflicts counsel, nature of case, funding mechanism for conflicts counsel, and timing moving forward						
Christianna Cathcart	Service	11/26/2024	0.80	\$200.00	-	\$160.00
Review Documents, Email to Trustee adding missing documents.						
Christianna Cathcart	Service	12/02/2024	2.90	\$200.00	80.0%	\$116.00
Review Opp Motion, Conflicts research						
Christianna Cathcart	Service	12/04/2024	2.20	\$200.00	100.0%	\$0.00
Review CRO App, Draft employment app, Research.						
Christianna Cathcart	Service	12/06/2024	2.40	\$200.00	50.0%	\$240.00
Amend Schedules, Email to client, Email to US Trustee submitting missing docs.						
Maurice VerStandig	Service	12/12/2024	0.50	\$400.00	-	\$200.00
Review stay relief motion from J. Johnson and accompanying memorandum of law						
Maurice VerStandig	Service	12/12/2024	2.40	\$400.00	50.0%	\$480.00
Research and begin drafting brief in opposition to motion to convert to Chapter 7 or place trustee in possession						
Maurice VerStandig	Service	12/13/2024	1.80	\$400.00	-	\$720.00
Continue drafting opposition to motion to dispossess or convert; Review and revise same, proofreading and reorganizing arguments						
Christianna Cathcart	Service	12/16/2024	0.10	\$200.00	-	\$20.00
A106 Communicate (with client) B110 Case Administration: Draft and send email to client providing details and updates regarding the upcoming hearing.						
Christianna Cathcart	Service	12/18/2024	0.10	\$200.00	-	\$20.00
A106 Communicate (with client) B260 Board of Directors Matters: Drafted and sent email to client regarding scheduling a meeting with the Board for updates on ongoing matters.						
Christianna Cathcart	Service	12/19/2024	0.80	\$200.00	-	\$160.00
A103 Draft/revise B110 Case Administration: Prepared November Monthly Operating Report (MOR) and Report for Controlled Non-Debtor Entities.						
Maurice VerStandig	Service	12/21/2024	0.30	\$400.00	-	\$120.00
Detailed e-mail to J. Carlson and M. Schmitz updating as to case, including update on passage of objection deadline on application to employ CRO, filing of counterclaim in J. Johnson adversary, filing of answer in case against state, and pendency of stay relief motion						
Maurice VerStandig	Service	12/21/2024	3.20	\$400.00	-	\$1,280.00
Research, outline, and begin drafting brief in opposition of stay relief motion of J. Johnson, with specific attention						

paid to (i) assembling authorities on inapplicability of adequate protection to unsecured creditors; (ii) inapplicability of Section 523(a) to legal entities; and (iii) inapplicability of annulment motions where underlying stay violation is knowing in nature

Maurice VerStandig	Service	12/22/2024	1.10	\$400.00	-	\$440.00
Continue drafting opposition to stay relief motion, including review of state court docket and insertion of citations and arguments addressing immediate issuance of an order for relief upon filing of a voluntary petition for bankruptcy relief						
Maurice VerStandig	Service	12/23/2024	0.50	\$400.00	-	\$200.00
Review and revise opposition to motion for stay relief, placing document in final form; Cull and collate exhibits thereto; File opposition brief and exhibits						
Maurice VerStandig	Service	12/24/2024	0.40	\$400.00	-	\$160.00
Detailed e-mail to M. Schmitz and J. Carlson re (i) grant of CRO application; (ii) withdrawal of motion to dispossess debtor or convert to chapter 7; (iii) timing strategy for FIBT action; (iv) deadlines correlative to plan voting and objections; (v) necessity of presence at confirmation hearing; (vi) tasks to be helmed by CRO; and (vii) CRO billing. Attach copies of prior day's filings.						
Maurice VerStandig	Service	12/26/2024	0.20	\$400.00	-	\$80.00
E-mail to M. Schmitz re settlement discussions with counsel for J. Johnson, outlining disputes and potential parameters of settlement and advising settlement be taken						
Maurice VerStandig	Service	12/27/2024	0.30	\$400.00	-	\$120.00
Call with M. Schmitz re settlement with J. Johnson, upcoming confirmation-centric deadlines, nature of debtor's assets, and potential avenues of monetary recovery						
<b>Non-billable entries</b>						
Christianna Cathcart	Service	10/10/2024	0.20	\$200.00	-	\$40.00
Review documents client sent, call with client re same						
Christianna Cathcart	Service	10/22/2024	0.20	\$200.00	-	\$40.00
Gather documents for complaint						
Christianna Cathcart	Service	11/20/2024	1.00	\$200.00	-	\$200.00
Call with client, Drafting MOR						
Christianna Cathcart	Service	11/21/2024	6.90	\$200.00	-	\$1,380.00
Gathering documents/reviewing file for trustee, Call with client, Email to client, Drafting MOR						
Christianna Cathcart	Service	11/25/2024	4.20	\$200.00	-	\$840.00
Conflicts of Interest Research, email to trustee documents, email to trustee.						
Christianna Cathcart	Service	12/20/2024	1.90	\$200.00	-	\$380.00
A103 Draft/revise B110 Case Administration: Monthly Operating Report/Periodic Controlled Non-Debtor Entities						
<b>Line Item Discount Subtotal</b>						<b>-\$3,860.00</b>

Time Keeper	Quantity	Rate	Discount	Total
Christianna Cathcart	21.1	\$200.00	-\$2,860.00	\$1,360.00
Maurice VerStandig	20.1	\$400.00	-\$1,000.00	\$7,040.00
				<b>Subtotal</b> <b>\$8,459.40</b>

## 00471-Jamieson CAPEX Fund, LLC

### Plan and Disclosure Statement

Attorney	Type	Date	Quantity	Rate	Total
Maurice VerStandig	Service	11/18/2024	2.30	\$400.00	\$920.00
Begin drafting plan of reorganization; Review of schedules and various client file entries in furtherance of same					
Maurice VerStandig	Service	11/19/2024	1.00	\$400.00	\$400.00
Continue work on drafting plan					
Maurice VerStandig	Expense	12/11/2024	1.00	\$195.56	\$195.56
Mailing: Service of plan, scheduling order and, where applicable. Class 1 ballot					
Maurice VerStandig	Service	12/11/2024	0.30	\$400.00	\$120.00
Coordinate service of plan, scheduling order and, where applicable, ballot					
Maurice VerStandig	Service	12/12/2024	0.10	\$400.00	\$40.00
Draft and file certificate of service for plan, scheduling order, and Class 1 ballots					
Maurice VerStandig	Service	12/23/2024	0.30	\$400.00	\$120.00
E-mail to J. Carlson re plan voting, identifying parties that may be inclined to vote in favor of the plan, noting the deadline for ballots to be cast, and discussing the subjective confirmation process in subchapter V; Review claims register and schedules in furtherance of same					
Maurice VerStandig	Service	01/06/2025	0.20	\$400.00	\$80.00
Call with J. Carlson re collecting ballots (no charge for unrelated portions of call)					
Maurice VerStandig	Service	01/08/2025	0.20	\$400.00	\$80.00
Draft amended plan, making change suggested by UST, altering prefatory sentence, and fixing typos					
Maurice VerStandig	Service	01/08/2025	0.30	\$400.00	\$120.00
Draft summary of ballots and review code sections on insider votes; Hold same for filing until expiration of voting period					
Maurice VerStandig	Service	01/08/2025	0.20	\$400.00	\$80.00

Review ballots as they are submitted and compile Excel sheet to track votes as they come in; Keep running pulse on proximity to requisite thresholds for plan acceptance; E-mail to - and calls with - J. Carlson re reaching out to friendly creditors to ensure ballots are cast (and emphasizing limits of what can be communicated to friendly parties); E-mail to M. Smitz re amendment and summary of ballots (This time entry is block billed because using a .1 allocation for each task would create an inequitably large obligation; no single task took more than six minutes but the tasks, in the aggregate, took at least ten minutes)

Maurice VerStandig	Service	01/12/2025	0.40	\$400.00	\$160.00
Draft declaration in support of confirmation to be executed by CRO, review Section 1129 and 1191 criteria in process of same					
Maurice VerStandig	Service	01/15/2025	0.10	\$400.00	\$40.00
Review confirmation order					

Time Keeper	Quantity	Rate	Total
Maurice VerStandig	5.4	\$400.00	\$2,160.00
			<b>Subtotal</b> <b>\$2,355.56</b>

## 00472-Jamieson CAPEX Fund, LLC

### Claims Administration

Attorney	Type	Date	Quantity	Rate	Total
Christianna Cathcart	Service	12/19/2024	2.00	\$200.00	\$400.00
Claims Administration and Objections: Conducted research on the inapplicability of debt nondischargeability provisions to companies or corporate entities.					
Maurice VerStandig	Service	12/26/2024	1.50	\$400.00	\$600.00
Research and draft objection to claim of J. Johnson					

#### Non-billable entries

Christianna Cathcart	Service	11/05/2024	0.10	\$200.00	\$20.00
Email proof of claim to creditors					
Christianna Cathcart	Service	12/13/2024	3.60	\$200.00	\$720.00
A103 Draft/revise B310 Claims Administration and Objections: Reviewed and revised opposition motion.					

Time Keeper	Quantity	Rate	Total
Christianna Cathcart	2.0	\$200.00	\$400.00
Maurice VerStandig	1.5	\$400.00	\$600.00

Subtotal \$1,000.00

## 00473-Jamieson CAPEX Fund, LLC

### Fee and Employment Applications

Attorney	Type	Date	Quantity	Rate	Total
Maurice VerStandig	Service	12/01/2024	3.50	\$400.00	\$1,400.00
Draft brief in opposition to motion to reconsider, including review of case law on conflicts counsel and review of UST guidelines concerning use of conflicts counsel					
Maurice VerStandig	Service	12/02/2024	2.70	\$400.00	\$1,080.00
Continue drafting opposition to motion to reconsider employment, including review of case law on "wait and see" cases and examination of records underlying foreclosure of real estate asset and transfer of third party monies through CAPEX, with time spent proofreading for clarity and typos as well as recalibrating tone of brief					
Maurice VerStandig	Service	01/13/2025	0.20	\$400.00	\$80.00
E-mail to M. Schmitz and J. Carlson re mechanics for paying T. Kapusta retainer, including detailed discussion of Subchapter V trustee fees and role of trustee in case					

Time Keeper	Quantity	Rate	Total
Maurice VerStandig	6.4	\$400.00	\$2,560.00
			<b>Subtotal \$2,560.00</b>

## 00491-Jamieson CAPEX Fund, LLC

### Adversary Suit Against Jeff Johnson

Attorney	Type	Date	Quantity	Rate	Total
Maurice VerStandig	Service	11/10/2024	0.90	\$400.00	\$360.00
Draft adversary complaint against Jeff Johnson, including review of statutory language and review of state court docket (.9); E-mail draft to client for review and comment (de minimis time; subsumed within .9)					
Maurice VerStandig	Service	11/16/2024	0.10	\$400.00	\$40.00
Coordinate service of complaint and summons through third party mailing vendor					
Maurice VerStandig	Service	11/16/2024	0.10	\$400.00	\$40.00
E-mail to state court counsel for defendant, attaching courtesy copies of complaint and summons					
Maurice VerStandig	Expense	11/17/2024	1.00	\$350.00	\$350.00

Filing Fee: Adversary filing fee for suit against Jeff Johnson

Maurice VerStandig	Service	12/11/2024	0.40	\$400.00	\$160.00
Review e-mail from opposing counsel attaching unfiled answer with counterclaim and assess various options for responding to counterclaim					
Maurice VerStandig	Service	12/22/2024	1.50	\$400.00	\$600.00
Draft motion to dismiss counterclaim (relying on significant amount of research and drafting from opposition to stay relief motion)					
Maurice VerStandig	Service	12/22/2024	0.30	\$400.00	\$120.00
Detailed e-mail to M. Schmitz and J. Carlson attaching draft motion to dismiss counterclaim and discussing Cantwell-Cleary issue and ethical/strategic rationale for not raising issue in brief					
Maurice VerStandig	Expense	12/26/2024	1.00	\$4.96	\$4.96
Mailing: Service of notice of Jeff Johnson claim objection (through third party mailing vendor)					
Maurice VerStandig	Service	12/26/2024	0.10	\$400.00	\$40.00
Review notice of claim objection issued by court and coordinate service of same					
Maurice VerStandig	Service	12/26/2024	0.50	\$400.00	\$200.00
Call with counsel for J. Johnson re potential settlement of adversary litigation, stay relief motion, and claim objection, including discussion of mechanics of settlement, how an amended claim may still be subject to potential objection, and timing of next steps					
Maurice VerStandig	Service	12/30/2024	0.20	\$400.00	\$80.00
Detailed e-mail to counsel for J. Johnson re terms of proposed settlement, next steps for formalizing same, and potential continuance of upcoming stay relief hearing					

#### Non-billable entries

Maurice VerStandig	Service	12/22/2024	0.80	\$400.00	\$320.00
Research on ethical issue re whether or not there is a requirement to disclose Cantwell-Cleary case from Fourth Circuit in connection with 523(a) claim, including review of North Dakota Rule of Professional Conduct 3.3					

Time Keeper	Quantity	Rate	Total
Maurice VerStandig	4.1	\$400.00	\$1,640.00
		<b>Subtotal</b>	<b>\$1,994.96</b>

## 00493-Jamieson CAPEX Fund, LLC

### Suit Against North Dakota

Attorney	Type	Date	Quantity	Rate	Total
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Christianna Cathcart	Service	10/23/2024	0.90	\$200.00	\$180.00
Called Taylor to gather information for complaint. Email to client. Reviewed Information					
Maurice VerStandig	Service	11/11/2024	1.10	\$400.00	\$440.00
Review and revise draft complaint against North Dakota					
Maurice VerStandig	Expense	11/18/2024	1.00	\$350.00	\$350.00
Filing Fee: Filing fee for suit against North Dakota for turnover and recovery of a fraudulent conveyance					
Maurice VerStandig	Service	11/25/2024	0.10	\$400.00	\$40.00
Coordinate service of process; Draft affidavit of service and file same					
Maurice VerStandig	Service	12/20/2024	0.30	\$400.00	\$120.00
Introductory call with A. Neir re suit against state and status of bankruptcy case					
Maurice VerStandig	Service	12/25/2024	0.20	\$400.00	\$80.00
Review rules governing substitution of government actors; Draft notice of substitution of new securities commissioner in place of former securities commissioner; Hold for filing until after Christmas					
Maurice VerStandig	Service	12/26/2024	0.30	\$400.00	\$120.00
Review e-mail from opposing counsel re scheduling and court's order re pre-hearing meet-and-confer; Respond re availability for meet-and-confer call and with proposed deadlines for various scheduling order line items, alongside request to expand number of interrogatories in case in light of large number of affirmative defenses pleaded					
Maurice VerStandig	Service	01/16/2025	0.30	\$400.00	\$120.00
Attend scheduling hearing					

Time Keeper	Quantity	Rate	Total
Christianna Cathcart	0.9	\$200.00	\$180.00
Maurice VerStandig	2.3	\$400.00	\$920.00
			<b>Subtotal</b> <b>\$1,450.00</b>

**Total** **\$17,819.92**

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due

10981	02/17/2025	\$17,819.92	\$0.00	\$17,819.92
<b>Outstanding Balance</b>				<b>\$17,819.92</b>
<b>Total Amount Outstanding</b>				<b>\$17,819.92</b>